From: Andrews, Lawrence
To: Nixon, Lance

Cc: <u>Banipal, Ben; Johnson, Lydia</u>

Subject: Wilcox AOC

**Date:** Monday, July 21, 2014 10:13:18 AM

Lance, as we discussed this morning, here are my initial comments on the AOC:

- Paragraph 78 states that "payment for past costs are not sought in this Settlement Agreement" (no sure if this is the case, need to confirm), then
- Paragraph 92(a) states that "the matters addressed in this Settlement Agreement are the Work, and Future Response Costs."
- However, para. 92(b) says in the last sentence "Respondents have... resolved their liability... for the Work, Past Response Costs and Future Response Costs"

Let me know if you have any questions. Thanks.

## Lawrence Andrews

Litigation Coordinator

U.S. Environmental Protection Agency, Region 6

**Enforcement Assessment Section** 

Superfund Division

214.665.7397

andrews.lawrence@epa.gov

This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. This information is the property of the U.S. Environmental Protection Agency, any review, reliance, or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.